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NHTSA-03-16/28-14

4171 Timberline Road Clinton, WA 98236 December 15, 2003

Dr. Jeffrey W. Runge, Administrator National Highway Traffic and Safety Administration 400 7<sup>th</sup> Street SW Washington, DC 20590

My dear Dr. Runge;

Recently, the Union of Concerned Scientists (UCS) unveiled the Guardian, an SUV design that could save thousands of lives each year from rollover and crash-related accidents and boost fuel economy. In fact, the Guardian would far exceed the 20.7 mpg government requirement for SUVs and even surpass the 27.5 mpg standard for cars- all for a mere \$750 increase in cost.

If the auto industry used the "off-the-shelf" technologies in the UCS blueprint, the resulting SUVs would:

- Save lives. The Guardian's stronger roof, unibody construction, and improved seat belt technology would save thousands of lives every year.
- Save money. The average SUV costs \$11,000 at the pump over its lifetime. The Guardian would put more than \$2,400 back in its owner's pocket.
- Save gas. Engine modifications and an aerodynamic design result in a thrifty 27.8 mpg, meaning less oil dependence and fewer heat-trapping gas emissions.
- Make no compromises on quality. The Guardian not only provides better safety and fuel economy, but also the same acceleration and power as a Ford Explorer.

We urge you to take the Guardian into consideration as you consider changes to national fuel economy standards and follow up on your expressed serious concern over SUV safety.

Sincerely

Lois Ewing

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